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Marvin Benton, Esq.  
Assistant Regional Counsel (6RC-S)  
U.S. Environmental Protection Agency  
Region 6  
1445 Ross Avenue  
Dallas, TX 75202-2733

**Re: Wilcox Oil Superfund Site, Bristow, Creek County, Oklahoma**

Dear Mr. Benton:

I am writing in response to your letters dated July 28, 2014 and August 5, 2014 directed to Atlantic Richfield Company ("ARC") and BP Corporation ("BP"). As a matter of clarification, you might have intended the BP letter to go to BP Products North America Inc., which is the successor to Standard Oil of Indiana and Amoco Oil Company. I have left you several voice mail messages seeking additional information about the site, but those messages have not been returned.

Upon receiving your letters, I requested a thorough search of BP's internal records, seeking any information that related to the Lorraine/Wilcox Oil Refinery. No such records were located.

In addition, the documents provided by EPA do not suggest any connection that ARC or BP might have to the Wilcox Oil Superfund Site that would lead them to enter into an Administrative Order on Consent. The document provided to ARC along with your July 28 letter is a "Continuation of Abstract Title to Lands Described in the Caption Herein" dated February 27, 1917. The parties mentioned in the document are Continental Refining Company and St. Louis-San Francisco Railway Co. Neither of those companies have an affiliation with ARC.

The document provided to BP along with your July 28 letter is a Tanksite Lease dated November 15, 1915 between Slick Oil Company and Standard Oil Company, pursuant to which Slick Oil Company apparently sold crude petroleum to Standard Oil Company. The purchase of crude petroleum would not appear to create any liability. Furthermore, the CERCLA petroleum exclusion would appear to apply.

If you have questions or would like to discuss this matter further, please feel free to contact me. ARC and BP reserve all of their rights to raise other defenses to any alleged claims of liability under CERCLA or other statute.

Sincerely,

Douglas S. Reinhart

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